

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Keyotta Sanford, being duly sworn on oath, depose and state that I have been employed as a Special Agent (SA), with the Federal Bureau of Investigation since January 2019, and am currently assigned to the Memphis Division of the Federal Bureau of Investigation.

AGENT BACKGROUND

1. I am a Special Agent with the FBI assigned to the Memphis Division and have been a Special Agent since January 2019. I am currently assigned to the Child Exploitation & Human Trafficking Task Force, investigating matters involving the sexual exploitation of children, human trafficking, and child sexual abuse material (CSAM). I have participated in various trainings and investigations involving online and computer related offenses and have executed numerous search warrants, including those involving searches and seizure of computers, digital media and electronically stored information.

2. I am an investigative or law enforcement officer of the United States within meaning of section 2510(7) Title 18, United States Code, and am empowered by law to conduct investigations and make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. The following information was obtained through observations and conversations of your affiant personally, through the assistance of other law enforcement agents and agencies, including their reports, and through other sources specifically named in this affidavit. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

APPLICABLE STATUTES AND DEFINITIONS

3. Title 18, United States Code, Section 1470 makes it a federal offense for anyone, using a means of interstate or foreign commerce, to knowingly transfer obscene material to another individual who has not attained the age of 16 years, or to attempt to do so.

STATEMENT OF PROBABLE CAUSE

4. The United States, including the FBI, is conducting a criminal investigation of Joel Evan Lattimer in Bartlett, in Shelby County Tennessee for violations of Title 18 U.S.C § 1470.

5. On October 18, 2021, a trained FBI Online Covert Employee (OCE) was contacted by an unknown individual who responded to a post via Whisper, an anonymous social networking application. The post referred to the OCE 1 making "cheese pizza" with his daughter. Your affiant is aware that "cheese pizza" is a slang term for child pornography. After a brief exchange, the unknown individual with the Whisper display name "Greg" was asked if he wanted to chat with the daughter. "Greg" agreed and was provided the Kik username of another FBI OCE, who was posing as a twelve year old girl named Jayleen. In particular, the following is a summary of Whisper messages observed between OCE 1 and Greg:

Oct-18-21

<i>Greg</i>	<i>Cheese pizza is delicious... when's the last time you had some?</i>
<i>OCE</i>	<i>Last night</i>
<i>Greg</i>	<i>Are you a mom or dad?</i>
<i>OCE</i>	<i>Dad. Mom isn't around anymore</i>
...	
<i>Greg</i>	<i>Like men watching how you make pizza</i>
<i>OCE</i>	<i>Yeah of course. And I like watching too</i>
	<i>She has WhatsApp</i>
	<i>U want to talk to her</i>
<i>Greg</i>	<i>Unfortunately no WhatsApp</i>
...	
<i>Greg</i>	<i>Got snap kik and wickr haha.</i>
...	
<i>OCE</i>	<i>Wait, she deleted snap. She still has kik</i>
<i>Greg</i>	<i>Well what's the kik?</i>

OCE *[OCE provided Jayleen's Kik username]*

Oct-25-2021

OCE *Is this evan?*

Jayleen can't talk tonight. I found some weed in her backpack and took her phone away.

...

Greg *Do anything else to punish her besides taking her phone lol*

OCE *I would say that I gave her a good hard fucking, which I did, but I do that all the time and I don't consider that punishment ;]*

...

Greg *Haha I'd offer to watch y'all have fun tonight, but don't think you'd enjoy that haha*

OCE *I actually would, but kinda scared to put that out*

Greg *Haha I understand. It can be scary. But would be very hot. I don't think she would mind*

Greg *She wouldn't*

OCE *Does she talk about me haha*

OCE *Yeah. She liked talking to you but she said you said that I asked you for money to watch. You must be thinking of someone else.*

Greg *No she misinterpreted I said I didn't have anything to offer back besides myself and I didn't think you wanted that*

OCE *Ok. She is only 12. She doesn't always understand*

...

Greg *I bet that is challenging, if I was there I would join in a heartbeat but the only thing I can do from here is watch and enjoy it with you*

OCE *Sounds good*

Greg *If I were to watch what program would you like to use*

OCE *Does wicker do video?*

Greg *Yeah and live calls*

...

OCE *Ok. Let's use that.*

Greg *Grayevan1216 is my name there*

OCE *Cool. Any special requests?*

Greg *Well if you were going to send something now I'm a boob guy ha, also wouldn't mind seeing a blow job lol*

OCE *Don't keep those on the phone I take to work, but can later. I meant anything you want me to do to her tonight?*

I have some lingerie that I bought from China that fits her.

Greg *Does she do much dirty talking*

That would be sexy to see, no Real special requests just see her having sex and hearing her moan it would be hot.

Watching her suck you cock as she plays with her tits would be amazing

6. October 18, 2021, OCE 2 was contacted on Kik, an instant messaging application, by individual with the display name "Evan Gray" and the Kik username "Belevan1216". Gray asked a number of questions regarding sexual abuse encountered by Jayleen's father and also

detailed information about various sexual acts. Jayleen told Gray she was 12 years old and made several references throughout their conversations about her being a minor. Gray frequently talked to Jayleen about things he wanted to do to her that were sexually explicit, to include describing in graphic details what he would like to see her do with a dog. Gray did not send any images of himself to Jayleen, but described himself as 37 years old, 6'2, brown hair, hazel eyes, and 220 pounds. Gray also requested Jayleen send him sexually suggestive content. In particular, the following is a summary of Kik messages observed between OCE 2 (Jayleen) and Gray:

Oct-18-2021

Gray *Have you ever had sex or sexual contact with someone you shouldn't? If unsure I can be more specific...*

Jayleen *But what did my dad say? I think I can guess if he told u to message me*

Gray *Mmm he may have said... you two enjoy each other.*

...

Gray *My sister and I when we were younger, and a cousin. I've also been with girls.. who enjoyed playing with their dogs. I've never done it, but I've definitely been there when they did.*

Jayleen *Really? I have 2 dogs and couldn't do that! Did u like watching it?*

Gray *Yes. It turned me on quite a bit. Most of the girls would just have them... lick. But a couple did everything.*

Jayleen *Oh licking wouldn't be that bad I guess*

Gray *Haha I'd enjoy watching you try that for sure. Would be very arousing.*
Imagine their long tongues licking up and down your wet little pussy... flicking over your clit, pushing a little inside you... very erotic

Jayleen *Yea*

Gray *Would you like to hear me voice jayleen?*

Oct-20-2021

Gray *Gotcha. What's the kinkiest thing someone has shown or you've watched?*

Jayleen *Oh I've watched porn with him so lots of different sex things*

....

Gray *Gotcha. Yeah. I've watched... siblings fool around on different chat program... and seen some other things pretty naughty haha*

...

Gray *I've also seen girls... play with their dogs hah*

Jayleen *I have never seen that! Like girls my age or adults?*

Gray *It's pretty hot and very naughty. I've seen them lick, suck the dog off, and fuck them. Mostly older girls*

...

Gray *Do you have a dog?*

Jayleen *Yea 2*

Gray *Are they fixed? Like neutered?*

Jayleen *Yea*

Gray *They probably could get hard then, but they could lick*

Oct-25-2021

Gray *How many times did daddy fuck you this weekend baby...*

Jayleen *2*

Gray *Mmmmm fuck. Wish I got to see more of your sexy body like he does haha*

Jayleen *Yeah me too*

Gray *Think we could swap just picture between us sometime*

Jayleen *Yea*

Like regular pics or like other ones

Gray *I mean I'd love to see how pretty you are... and also your sexy body haha*

Jayleen *Yea u can't tell my dad*
He's told me not so send any naked pics

Gray *I would never tell... I'm a boob guy haha so that's what I'd love to see someday haha... I'd be glad to show you my cock after that ...*

Gray *I promise I haven't even talk to your dad besides whisper when he gave me your name*
Whatever you sent me will be the first thing I've seen of you...

Jayleen *(OCE sends 2 images...)*
How old do u think I look? I think I look older in the first one. How old do u think I look? My friend said 15 which made me laugh.

Gray *Oh my lord absolutely gorgeous. I totally thin k you're a very pretty 18 year old haha.*

Jayleen *I wish. Did he tell u how old I was?*

Gray *Nope and I'm good guessing haha*

Jayleen *I won't lie cuz I think it's messed up when girls do that*

Gray *Do you still have Snapchat? Not gonna lie, easier to swap pics and stuff there haha*

Jayleen ***Well maybe with the filters lol. But I'm 12***

Gray *I'll be honest. The first time you send me something... naughty, I would have no problem showing myself haha.*

....

Gray *kk. Haha. What is the sexiest thing you have on your phone now?*

Jayleen *Pussy pics and videos*
Gray *Oh my...*
Jayleen *I keep them in the hidden folder on my photos*
Gray *Well if you felt like sharing I wouldn't stop you haha*
Jayleen *K I'm walking up next class. I'll message u later*

Nov-4-2021

Gray *Grayevan1216 if you ever got wickr darlin Or are you still grounded*
...
Gray *Would love to chat. How has school been? Yeah he told me about the weed*
Jayleen *It's good*
K I asked him to cuz I didn't want u to think I was ignoring u
...
Gray *Yeah I was definitely thinking about... getting to watch each other and playing together a lot haha*
Jayleen *Yea he said u guys talked about watching I think. He asked if I'd be ok with it?*
Gray *Did you say you were?*
Jayleen *Yea I like u*
...
Gray *Does he like head once he gets home lol*
Jayleen *Yea lol he always like it*
He says I'm good at it lol
Gray *Haha I may have told him I wanted to see you doing that lol*
Jayleen *Yea I'd like that*
Maybe u could talk when I did it

Gray *I would love to talk and tell you how sexy you look while doing it... would also like to hear you moan my name while he's fucking you lol that would be hot*

....

Gray *I can't wait to watch. I bet you look so sexy...*

...

Gray *kk. Besides with dad... have you done anything else sexual since we last talked? Lol*

Jayleen *No Well just with myself lol*

Gray *Lol how many times have you masturbated*

Jayleen *2*

Do you

Gray *Mmm well I'm looking forward to seeing more. Touching myself to your sexy body will be much better then just imagining it haha*

Jayleen *Yea it would*

If I can get home to do it when do u wanna do the video thing

Gray *Sure darlin! We could do it tonight after 6:30 pm, at 8:30 I have to run to pick up a friend from the airport, but I would be available again at 10:00ish*

7. Around November 4, 2021, Gray asked Jayleen to set up a Wickr account, which is an internet application which lets users exchange end-to-end encrypted and content-expiring messages, including photos, videos, and file attachments. After explaining how Wickr worked, Gray sent Jayleen two videos which appeared to be of a male masturbating. After sending the first video, Gray asked Jayleen to make a video playing with her "tits". Your affiant reviewed a 20 second recording, which appeared to show an unknown adult male wearing blue shorts and masturbating his penis with his left hand. Also noticed in the recording was a wide black band watch on the male's left wrist. The male's penis was clearly visible and he could be heard

moaning and saying the following: "I want to see that body so bad baby ... I promise it will be alright. I bet you are very sexy."

8. Investigators sent a subpoena to Wickr seeking subscriber information associated with the Wickr user account "grayevan1216". On October 29, 2021, Wickr identified the account was created on October 14, 2021 and was installed multiple times on an iOS device, that is, an iPhone. No other metadata was provided via the legal request.

9. A subpoena was sent to Kik seeking subscriber information associated with the Kik user account "Belevan1216". On October 26, 2021, Kik identified the subscriber as Evan Gray. Kik records did provide IP address logs, which identified the IP address **73.203.178.179** as being used to access the Kik account "Belevan1216" during the timeframe of the alleged criminal activity.

10. An open source "who-is" search for IP address **73.203.178.179**, which was provided by Kik, revealed that the IP address is registered to Comcast Cable in for assignment to their Internet customers. Investigators sent a subpoena to Comcast Cable seeking subscriber information for the IP address **73.203.178.179** during the timeframe of the alleged criminal activity.

11. On November 11, 2021, Comcast Cable provided the following subscriber information:

NAME	Joel Lattimer
ADDRESS	6627 Clingman's Cv, Bartlett, TN 38135
TYPE OF SERVICE	Internet
ACCOUNT STATUS	Active

12. The internet, including messaging applications such as Wickr and Kik, is a means and facility of interstate commerce.

13. Open source research on the address identified a potential suspect as Joel Evan Lattimer. Further research revealed Lattimer was enlisted in the United States Navy as a Master Chief and lived at the home with his wife, Suzanne Lattimer and their 16 year old daughter.

14. On December 1, 2021, your affiant performed a search of the Tennessee driver license database for records related to Joel Evan Lattimer. The Tennessee driver's license database described Lattimer as a 41 year old white male, with brown hair, green eyes, 6'3"

height, and approximately 235 lbs., that resided at 6627 Clingman's Cv, Bartlett, TN 38135. FBI Memphis received confirmation from the United States Naval Criminal Investigative Service (NCIS) that Lattimer was a Master Chief stationed at the Naval Support Activity Mid-South naval base located in Millington, Tennessee. Investigators were further advised that Lattimer's work schedule was irregular, which was most likely due to the ability to telework from home as well as work on base.

15. On December 2, 2021, the FBI obtained a federal search warrant for the premises known as 6627 Clingman's Cove, Bartlett, Tennessee, 38135, and the person of Joel Evan Lattimer.

16. On December 3, 2021, law enforcement officers executed the federal search warrant. Joel Evan Lattimer was present; however, he invoked his right to an attorney. Also present during the search was Suzanne Lattimer and their minor daughter. Suzanne agreed to speak with Agents and advised that she had been married to Joel for over 16 years. Earlier in their marriage, the couple struggled with Joel's sex addiction; however, he was able to overcome it and mentored other Navy couples with similar issues. Since the COVID-19 pandemic, Joel worked primarily from home. He only had one phone, which was used for work and personal reasons and was identified as an iPhone. She had never heard of Kik or Whisper, but did believe she heard once heard about Wickr. She did not believe Joel used the aforementioned applications.


17. Suzanne was shown some chats from Kik between Gray and Jayleen. In particular, she was shown the chat and image in which Jayleen identified herself as being 12 years of age. Suzanne was also shown the message where Gray told Jayleen he had sexual contact with his sister and a cousin when he was younger. Suzanne advised Lattimer's sister had accused Joel of sexual assault. Suzanne was also shown the video, which was sent around November 4, 2021, by Gray to Jayleen via Wickr. Suzanne identified the male in the video as her husband, Joel Lattimer.

18. Law enforcement officers seized the iPhone that was identified as belonging to Joel Lattimer. An initial review of the iPhone confirmed that the Wickr application was installed on Lattimer's iPhone and contained log entries during the timeframe of the chats with Jayleen.

CONCLUSION

Based on my investigation, I believe that there is probable cause to believe that Joel Evan Lattimer attempted to transfer obscene material to individual who had not attained the age of 16 years, in violation of 18 U.S.C 1470, as set forth in this criminal complaint and respectfully request that the Court issue an arrest warrant.

AND FURTHER, AFFIANT SAITH NOT.



KEYOTTA SANFORD
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 41 by telephone, this 3rd day of December, 2021.



HON. ANNIE T. CHRISTOFF
United States Magistrate Judge